

REMARKS

Applicants appreciate the Examiner's thorough review of the present application, and respectfully request reconsideration in light of the preceding amendments and the following remarks.

Claims 1-5, 8-10 and 21-32 are pending in the instant application. Claim 20 has been cancelled without prejudice or disclaimer. Several other claims have been amended to improve claim language. No new matter has been introduced through the foregoing amendments.

Applicants note that there is no rejection of **claim 32**. Indication of allowable subject matter of claim 32 is thus believed appropriate and respectfully requested.

The *35 U.S.C. 112, first paragraph* rejection of claims 28 and 31 is respectfully traversed. The Examiner bases his rejection on the allegation that the specification as filed does not *explicitly* state that "an entirety of the top surface of the bill guide plate is accessible from the outside through said loading slot, thereby facilitating cleaning of the bill guide plate without having to open the door." Applicants respectfully submit that the written description requirement under *35 U.S.C. 112, first paragraph* does not require the specification to include an explicit recitation of the claim wording. Rather, the written description requirement, as quoted in the Office Action, only requires that the specification "reasonably convey[s] to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention."

It is respectfully submitted that the original disclosure reasonably conveys to a person of ordinary skill in the art that the claim feature, i.e., "an entirety of the top surface of the bill guide plate is accessible from the outside through said loading slot," was in the inventor's possession at the time the application was filed. Indeed, FIG.5 clearly shows that the entire top surface 522 of the bill guide plate 52A is accessible from the outside through loading slot 520. The same is also evident from FIG. 2 where the top surface of the bill guide plate 52A is visible through the opening

defined between reference numerals 52A and 52B. Since the bill guide plate 52A and loading slot 520 are configured for loading bills or bank notes, a person of ordinary skill in the art would understand that their width must be at least equal to the size of such bills or bank notes. With such a width and the open arrangement of the loading slot 520 as shown in FIG0.5, the person of ordinary skill in the art would further recognize that the cleaning of the bill guide plate 52A can be done through loading slot 520 without the need of opening the door. The claimed subject matter is thus supported by the application as filed.

Withdrawal of the *35 U.S.C. 112, first paragraph* rejection is now believed appropriate.

Indication of allowable subject matter of **claim 28** in the absence of art rejection is also requested.

The modified *35 U.S.C. 103(a)* rejections of claims 1-5, 8-10, 20-26 as being unpatentable over *Parish* in view of *Watabe*, and claims 29-31 as being unpatentable over *Parish* in view of *Watabe* and in further view of *Townsend* are noted. Basically, the Examiner alleges that the claimed invention would have been obvious over the art because Applicant has not disclosed that the claim features provide an advantage or solve a stated problem. See Office Action at page 5, the last nine lines. This is not a correct obviousness argument under *35 U.S.C. 103(a)*.

Applicants respectfully traverse the Examiner's rationale as being improper, at least, because a *prima facie* case of obviousness has not been established. The Examiner has not presented any evidence that would have led a person of ordinary skill in the art to modify the prior art device to arrive at the claimed invention. In that regard, as has been held *repeatedly* by the Board of Patent Appeals and Interferences, the mere (arguable) fact that a difference (between the teachings of the prior art and the claimed subject matter) does not solve any recognized problem does not, *ipso facto*, make that difference obvious under *35 U.S.C. 103*, as already detailed in a previous Amendment paper (November 27, 2007).

For at least the reason detailed above, the 35 U.S.C. 103(a) rejection is improper and should be withdrawn. Notwithstanding and solely for the purpose of expediting prosecution, Applicants have further amended the independent claims and present the following remarks to establish that the claimed invention indeed provides at least one advantage over the art.

In particular, independent **claim 1** has been amended to incorporate the limitations previously recited in claim 8, i.e.,

“a protrusion is formed on a rear wall of the bill guide plate and a cylindrical protrusion is formed on a front lower wall of the bill guide plate, the cylindrical protrusion comprising an internal thread; and

a groove is formed in a rear inner wall of the first open end of the mounting member, and the protrusion of the bill guide plate is insertable into the groove and the bill guide plate is tiltable towards the mounting member in order to assemble the bill guide plate onto the mounting member”

and to remove the limitation of

“the mounting member and the bill guide plate fixed thereto are inserted into the notched part of the control panel”

which is now recited in claim 8 dependent on claim 1.

Embodiments of the gaming machine defined in amended claim 1 can obtain several advantages as follows.

1. The bill guide plate (e.g., 52A) can be easily assembled onto the mounting member (e.g., 52B) by simply inserting the protrusion (e.g., 528A, FIG. 6) of the bill guide plate (e.g., 52A) into the groove (e.g., 528C, FIG. 6) and tilting the bill guide plate (e.g., 52A) towards the mounting member (e.g., 52B).

2. The bill guide plate (e.g., 52A) can also be easily separated from the mounting member (e.g., 52B) in the reverse order.

3. By providing the bill guide plate (e.g., 52A) as a separate member, the bill guide plate (e.g., 52A) can be easily detached for cleaning and/or replacement and/or repair.

Since *Parish*, even in view of *Watabe*, still fails to explicitly teach or disclose the claim features as admitted in the Office Action, the combination of the references (if proper) would not be able to achieve any of the advantages detailed at points 1-3 above. Specifically, there is no reasonable expectation that the combined device (if proper) would allow the *Parish* bill guide plate (20, FIG. 2) to be easily assembled onto or detached from the mounting member. To the contrary, the notch-and-plug engagement of the *Parish* bill guide plate (20, FIG. 2) with an upper top plate (152, FIG. 8) into an assembled structure (150, FIG. 8) which is then tightly housed inside the housing (40, FIGs. 8-9) makes it difficult to assemble or, at least, detach the *Parish* bill guide plate (20) for cleaning and/or replacement and/or repair. Thus, a person of ordinary skill in the art would understand that the references, if properly combinable, would still fail to achieve the advantages of embodiments of the claimed invention.

The deficiency of *Parish* is not curable by any of the teaching reference(s), including *Watabe* and *Townsend*, and therefore independent claim 1 is patentable over the applied art of record.

The **dependent claims** are considered patentable at least for the reason(s) advanced with respect to the independent claim 1.

Each of the Examiner's rejections has been traversed/overcome. Accordingly, Applicants respectfully submit that all claims are now in condition for allowance. Early and favorable indication of allowance is courteously solicited.

The Examiner is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

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